

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF NEW HAMPSHIRE

<i>Very Reverend Georges F. de Laire,</i>)	Civil Action No.: 21-CV-00131-JL
<i>J.C.L.</i>)	
<i>Plaintiff,</i>)	
)	ASSENTED-TO MOTION TO
<i>v.</i>)	WITHDRAW AS COUNSEL
)	
<i>Gary Michael Voris, et al.,</i>)	
<i>Defendants.</i>)	

COME NOW Attorneys Stephen T. Martin and Seth J. Hipple, counsel for the Defendant, Saint Michael's Media, and for their Motion to Withdraw as Counsel, states and moves this Honorable Court as follows:

1. Counsel brings this Motion pursuant to, and in accordance with, Local Rule 83.6 (d), as the Plaintiff's Motion for Default Judgment remains pending before this Court.
2. Plaintiff and Saint Michael's Media have fully settled Plaintiff's claims between Plaintiff and Saint Michael's Media.
3. The only claim remaining in this case is Plaintiff's claim against the defaulted Party, Marc Balistrieri.
4. The only hearing scheduled in this case, is the hearing on Plaintiff's Motion for Default Judgment against Defendant Balistrieri.
5. Saint Michael's Media and counsel have previously been excused from participating in hearings because the case has settled as to Saint Michael's Media.
6. Saint Michael's Media does not intend to participate in the January 31 hearing.
7. As such, Saint Michael's Media has asked that Attorneys Martin & Hipple withdraw from this case.

8. Suzanne Elovecky, Esq. for the Plaintiff provided assent to this Motion via email, and Attorney Rick Lehman for Defendant Voris provided assent to this Motion via email.¹

WHEREFORE Counsel respectfully request that this Honorable Court:

- A. GRANT this Motion and enter Counsels' Withdrawal; and
B. Grant all further relief that this Honorable Court deems just and proper.

Dated: January 9, 2025

Respectfully submitted,
The Law Offices of
Martin & Hipple, PLLC

/s/Stephen T. Martin
Stephen T. Martin, Esq.
390 Loudon Road
Concord, NH 03301
603-856-0202 (Ext. 1)
smartin@nhlegalservices.com
NH Bar#: 19567

/s/Seth J. Hipple
Seth J. Hipple, Esq.
390 Loudon Road
Concord, NH 03301
603-856-0202 (Ext. 1)
smartin@nhlegalservices.com
NH Bar#: 19555

CERTIFICATE OF ASSENT

COMES NOW Attorney Stephen T. Martin, and hereby certifies that on January 8, 2025, Plaintiff's Counsel and Defendant Voris' counsel both assented to the relief requested herein by email.

Dated: January 9, 2025

/s/Stephen T. Martin
Stephen T. Martin, Esq.

¹ Counsel did not seek assent from Marc Balestrieri because he is a defaulted party who has not moved to set aside the default and is therefore not entitled to "proceed or litigate" in this case. See ECF Doc. 286 p.1.

CERTIFICATE OF SERVICE

COMES NOW Attorney Stephen T. Martin, and hereby certifies that I have caused a copy of the foregoing to be served upon all counsel of record using this Court's CM/ECF system, and that I have also mailed a copy to:

Saint Michael's Media
23205 Gratiot #377
Eastpointe, MI 48021

Dated: January 9, 2025

/s/Stephen T. Martin

Stephen T. Martin, Esq.